

AUGUST 2003



FACT SHEET

Resource Conservation and Recovery Act (RCRA) Hazardous Waste Management Permit for GE Plastics Mt. Vernon, Inc. and Mt. Vernon Phenol Plant Partnership EPA ID Number: IND 006 376 362

Introduction

The U.S. Environmental Protection Agency (U.S. EPA) has prepared this fact sheet to inform the public of the process involved in issuing a Resource Conservation and Recovery Act (RCRA) Hazardous Waste Management Permit.

The Solid Waste Disposal Act was amended by RCRA in 1976, further amended by the Hazardous and Solid Waste Amendments (HSWA) of 1994. Hazardous Waste and Consolidated Permit Regulations were promulgated on May 19, 1980.

In the State of Indiana, the Indiana Department of Environmental Management (IDEM) is authorized by the Indiana Environmental Statutes (IC 13-22) to administer the hazardous waste permit program and related hazardous waste management requirements.

IDEM is authorized by U.S. EPA for the base RCRA program. However, the State of Indiana has not yet been authorized for certain HSWA regulations, such as the Boilers and Industrial Furnaces regulation, commonly known as the BIF Rule. The U.S. EPA is proposing to issue a federal RCRA permit to GE Plastics Mt.

Vernon, Inc. (Operator) and Mt. Vernon Phenol Plant Partnership (Owner) for the BIF units at the facility located at One Lexan Lane, Mt. Vernon, IN 47620-9364.

The BIF units at the facility is operating under the interim status of the BIF Rule. The Owner and Operator will be referred to as the "Permitees." as Permitees.

Facility Description

GE Plastics Mt. Vernon, Inc. (GEPMV) operates an integrated plastics manufacturing facility located in Mt. Vernon, Indiana. Mt. Vernon Phenol Partnership (MVPPP) has owned the Phenol Plant since 1987. The hazardous waste burning boilers (BIFs) are located in the Phenol Plant. The facility includes a phenol manufacturing operation that generates five hazardous and one non-hazardous waste streams, which are combined and burned for energy recovery in two on-site boilers, designated as H530A and H530B. These two boilers are subject to 40 CFR Part 264, Subpart H: Hazardous Waste Burned in Boilers and Industrial Furnaces, commonly referred to as the BIF Rule. The steam generated from these boilers is used to supplement the steam

requirements for the entire manufacturing facility.

GEPMV (Operator) and MVPPP (Owner), the Permittees, must obtain a RCRA permit to operate these boilers, which became subject to the BIF Rule when the regulation was promulgated in 1991. Since that time, the Permittees have certified that the BIF units have maintained compliance with Adjusted Tier I requirements for metals and chlorine provided in 40 CFR § 266.106(e) and 107(e) of the regulation and operated the boilers under the interim status provisions of the BIF Rule.

The Mt. Vernon facility feeds one type of liquid hazardous waste fuel to the boilers. The fuel is a combination of 5 hazardous and one non-hazardous waste streams as follows:

- (1) Phenol manufacturing distillation cracker bottoms (K022)
- (2) Heavy end cracking by-product light overhead (D018)
- (3) Alpha-methyl styrene (AMS) distillation column bottoms (D001)
- (4) Acetophenone distillation column bottoms (D001)
- (5) Oil purge from dephenylation (D001)
- (6) Bis-phenol-A (BPA) manufacturing distillation tars (non-hazardous)

The hazardous fuel is maintained between 250 and 275 °F and fired in the boilers. Each boiler has a rated heat input of 75 million Btu/hour and generates 70,000 pounds/hour of saturated steam at of 175 pounds/square inch nominal gauge pressure (at the steam header). The boilers are base-load units operating at a nominal steam output. These boilers are typically supplied with 90 to 95 % of the heat input by the hazardous waste with natural gas as supplemental fuel.

Current RCRA Regulatory Status

The U.S. EPA permit is necessary for the on-site BIF facility, because the State of Indiana has not been authorized to administer the BIF Rule.

The State of Indiana has been authorized to administer most of the RCRA program. Therefore, the RCRA permit issued under the state program contains the basic operating conditions for this facility, such as storage, closure, corrective action, air emissions under 40 CFR Part 264, Subparts AA and BB.

Basis for Decision to Issue the RCRA Permit

In May 1998, U.S. EPA requested that the Permittees submit a RCRA Part B permit application for the interim status boilers burning hazardous wastes. The permit application includes a trial burn plan designed to demonstrate compliance with the BIF Rule. The final trial burn plan was approved by U.S. EPA on September 11, 2001, following an official notice to the interested parties in accordance with 40 CFR § 270.66.

The United States Environmental Protection Agency (U.S. EPA) approved the proposed Trial Burn Plan on May 7, 2001, following an official notice to the interested parties in accordance with 40 CFR § 270.66. The Trial Burn for the boilers was conducted from November 27 through December 5, 2001. The original Trial Burn Report was received on March 5, 2002. Following the review conducted by U.S. EPA and subsequent revisions to the

original report, the final Trial Burn Report was approved by U.S. EPA on July 31, 2003.

The U.S. EPA has reviewed the revised Part B Application, which was received on October 2, 2000. The approved Part B Application and trial burn report are the basis for our decision to issue the proposed RCRA permit to the Permittees.

Tentative Decision:

Subject to public notice and comment under 40 CFR § 124.10, and under the authority of the Resource Conservation and Recovery Act as amended by the Hazardous and Solid Waste Amendments of 1984 ("HSWA"), the U.S. EPA proposes to issue a RCRA permit to the Permittees for the operations of the BIF facility in Mt. Vernon, Indiana. The term of this permit is ten years from the effective date of the permit.

Procedures for Reaching a Final Permit Decision:

This draft RCRA hazardous waste permit is based on the administrative record, which consists of this fact sheet, the permit application and other data the facility owner/operator has submitted, and other relevant material that the U.S. EPA has assembled. A copy of the administrative record is available locally for viewing at the Alexandrian Public Library, 115 W. 5th Street, Mt. Vernon, IN 47620. Copies of the draft permit and fact sheet are also available from the U.S. EPA at the address given below. The official administrative record supporting the U.S. EPA's tentative decision is maintained at the U.S. EPA's Regional office at the address listed below.

Comments on this proposed action may be submitted to the addresses listed below, not later than September 22, 2003.

After the close of the public comment period, the U.S. EPA will review and consider all comments

received before making a final permit decision. The U.S. EPA will also prepare and send to all commenters a document responding to significant comments received during the public comment period. Those who submitted written comments during the official comment period or made a statement at the hearing will be notified of any final decision. Within 30 days of a final decision, any person who submitted written comments or made a statement at the hearing may petition the U.S. EPA's Environmental Appeals Board to review the decision.

Comments, requests for information, and requests for copies of the draft permit and fact sheet should be made to:

Mr. Wen Huang, P.E.
Waste Management Branch (DW-8J)
Waste, Pesticides, and Toxics Division
U.S. Environmental Protection Agency,
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A copy of the draft permit can be found on the U.S. EPA web site at:

<http://www.epa.gov/reg5rcra/wptdiv/permits/index.htm>